

Dec. 14, 2016

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St, SW
Washington, D.C. 20554

Re: CG Docket No. 03-123: Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities.

Dear Madam Secretary:

On Tuesday, December 13, 2016, Jim Courter, former CEO of IDT Corporation, Carl Billek, Senior Regulatory Counsel for IDT Telecom, Inc. ("IDT") and the undersigned, consultant to IDT, met with Amy Bender of Commissioner O'Rielly's office; Nicholas Degani of Commissioner Pai's office, and Howard Symons and Terry Cavanaugh of the Office of General Counsel to discuss IDT's Petition for Rulemaking in the above-captioned docket. IDT asked the Commission to consider moving forward early in 2017 with a proceeding to broaden the base of funding to collect contributions for the Telecommunications Relay Services ("TRS") Fund. IDT made the following points in the meetings:

- The current system of recovering the costs of intrastate IP-based relay services from interstate and international services is inconsistent with the statutory language (which states that costs for intrastate telecommunications relay services shall be recovered from the intrastate jurisdiction).
- By forcing interstate and international service providers to contribute nearly one billion dollars to the TRS Fund to recover the costs of intrastate IP-based relay services, the Commission is harming interstate and international providers and their end user consumers and distorting the market for these telecommunications services while concurrently conferring an unlawful, unnecessary benefit upon intrastate service providers and their end users.
- Almost all of the commenters on IDT's Petition submitted in February of this year supported IDT's proposal to broaden the base of funding, including the deaf and hard-of-hearing community and the major TRS providers.

- Those comments that suggested linking TRS Fund collections to Universal Service Fund collections are inapposite because the two Funds are governed by completely different statutes.
- Implementing the change in collection methodology is administratively simple because the information concerning intrastate and total revenues is already contained on the FCC Form 499-A and available to the TRS Fund administrator.

Sincerely,

A handwritten signature in black ink, reading "John Windhausen, Jr.", enclosed in a rectangular box.

John Windhausen, Jr.

Consultant to IDT

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cc: Amy Bender
Nick Degani
Howard Symons
Terry Cavanaugh